

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

UNITED STATES OF AMERICA	§	
<i>Plaintiff</i>	§	CRIMINAL DOCKET 4:17-CR-434
	§	<b>HONORABLE ALFRED H. BENNETT</b>
vs	§	
	§	
JAMINE LAKE, et al	§	
<i>Defendant</i>	§	

**UNOPPOSED MOTION FOR EXTENSION OF OBJECTION DEADLINE AND CONTINUE SENTENCING**

**TO THE HONORABLE ALFRED H. BENNETT:**

Jamine Lake files this Motion and would show as follows:

1. Lake was charged by superseding indictment with conspiracy to commit sex trafficking and sex trafficking.
2. A superseding Information was filed, and Lake plead guilty to count one of that information – misprision of a felon on March 14, 2019.
3. The Presentence Investigation Report (PSIR) in this matter was disclosed to counsel on April 18, 2019.
4. Objections to the PSIR were due on May 2, 2019.
5. Sentencing in this matter is on the Court’s docket for May 23, 2019.
6. Counsel has reviewed the PSIR and met with the Defendant to review the PSIR and guidelines; however, requests an additional 30 days to respond to the PSIR.
7. Counsel has been working diligently to meet deadlines in other cases, *See United States v Brown*, 4:17-CR-567-1 (Federal Death Penalty Act murder for hire conspiracy alleging a second homicide during the expected punishment phase. Counsel has been tasked to prepare an omnibus budget including all anticipated expenses for all necessary experts and staff

involved in the case in chief and deal with numerous matters including preparing and presenting mitigation evidence to the Capital Case Unit in Washington, D.C.. The Department of Justice has since decided to seek the death penalty, thereby increasing budgeting and case management aspects of counsel's obligations); *Davis v. Davis*, 4:16-CV-01867 (a capital case involving among other claims, a claim of Intellectual Disability); *Davis v. Harper*, 4:16-CV-00762 (a capital habeas corpus case brought under 28 U.S.C. § 2254 where counsel is responding to the State's 287-page Motion for Summary Judgment. Counsel's response includes over 30 claims where the issues are fact-intensive and require complex legal analysis. Counsel just received a short continuance from the May 16<sup>th</sup> deadline to continue work addressing all claims); *State v. Wilkerson*, 2018-CR-1793 (a sexual assault against a family member case. Counsel is set to pick a jury in San Antonio on June 17, 2019).

8. Counsel respectfully requests an extension of 30 days to respond to the PSIR.
9. The government is unopposed to this motion.

**PRAYER**

In order that counsel may prepare a response to the PSIR, Jamine Lake prays the Court grant a 30-day extension of the deadline to object and continue the sentencing hearing to a date commensurate with the Court's docket.

Respectfully Submitted,

/s/ Ali R. Fazel

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Attorney for Defendant,  
**JAMINE LAKE**

**CERTIFICATE OF CONFERENCE**

The foregoing motion was discussed with the Assistant United States Attorney assigned to the matter, they are unopposed to the motion to continue the final revocation hearing.

/s/ Ali R. Fazel

Ali R. Fazel

**CERTIFICATE OF SERVICE**

Ali R. Fazel certifies that on May 13, 2019, a true and correct copy of this document has been served via ECF notification and electronic mail to:

Sherri Lynn Zack  
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**ATTORNEY FOR THE UNITED STATES**

/s/ Ali R. Fazel

Ali R. Fazel